

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

United States of America

v.

Weronika Janczuk,

Defendant.

Deferred Prosecution Agreement

21 Mag. 10886

TO: Weronika Janczuk

On November 12, 2021, a criminal complaint was issued by a United States Magistrate Judge in the Southern District of New York, in which you are accused of committing offenses against the United States, to wit, making threatening interstate threats, in violation of 18 U.S.C. § 875(c), and cyberstalking, in violation of 18 U.S.C. § 2261A. However, after a thorough investigation, it has been determined that the interest of the United States and your own interest will best be served by deferring prosecution in this District. Prosecution will be deferred during the term of your good behavior and satisfactory compliance with the terms of this agreement for the period of fifteen months from the signing of this agreement, with the possibility of early termination after twelve months from the signing of this agreement, at the discretion of the United States Attorney. The terms and conditions constituting your good behavior and satisfactory compliance are as follows:

- (1) You shall refrain from violation of any law (federal, state, and local). You shall immediately contact your U.S. Pretrial Services Officer if arrested or questioned by a law-enforcement officer.
- (2) You shall associate only with law-abiding persons.
- (3) You shall work regularly at a lawful occupation and/or regularly attend school and support your legal dependents, if any, to the best of your ability. When out of work or not attending school, you shall notify your supervising U.S. Pretrial Services Officer at once. You shall consult him or her prior to job and school changes.
- (4) You shall not leave the Southern or Eastern Districts of New York without permission of your supervising U.S. Pretrial Services Officer.
- (5) You shall notify your supervising U.S. Pretrial Services Officer immediately of any change in your place of residence.
- (6) You shall follow your supervising U.S. Pretrial Services Officer's instructions and advice.
- (7) You shall report to your supervising U.S. Pretrial Services Officer as directed.

As a further condition you hereby consent to disclosure, by any federal, state or local government agency, or by any medical or substance abuse treatment provider, to the U.S. Pretrial Services Officer supervising your case, of such medical and treatment records as may be requested by the Pretrial Services Officer to evaluate deferral of prosecution in this case. You further agree that you will execute any additional consent forms that any such agency or provider may require to release such information.

Special conditions are as follows:

- (1) You shall participate in mental health treatment as directed by your U.S. Pretrial Services Officer. This includes taking any prescribed medications in accordance with instructions of your mental health treatment provider(s).
- (2) You shall have no contact with the following victims in this case and their family members, by any means, including through posting about them on social media, and also including directly causing or encouraging anyone else to contact such victims.
 - a. Duncan Sahner
 - b. Elizabeth Sahner
 - c. Christian Sahner
 - d. Brigid Casey
 - e. Ronald Sahner
 - f. Thomas Phillips
 - g. Sarah Jane Sahner
- (3) You shall have no contact with any employee of Abdiel Capital, including those listed below, by any means, including through posting about them on social media, and also including directly causing or encouraging anyone else to contact such victims.
 - a. Colin Moran
 - b. Geoff & Lauren Gentile
 - c. Peter & Lindsay Snedeker
 - d. David Escamilla
 - e. David Chi
 - f. David Mosher
 - g. Natalie Dabkowski
 - h. Albert Horsting
 - i. Rachel Leichner
 - j. Connor Cucalon
 - k. Megan Clarine
 - l. Robert Kriegsman
 - m. Jihyun Kim
 - n. Charlotte Burke
 - o. Tori Mercado
 - p. Stephen Pascoe

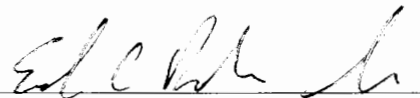
- (4) You shall not go to the following locations:
- a. 78 Durand Road, Maplewood, NJ 07040
 - b. Abdiel Capital, 90 Park Avenue, New York, NY 10016
 - c. Latham & Watkins, 1271 Avenue of the Americas, New York, NY 10020
 - d. St. Vincent Ferrer Church, 869 Lexington Avenue, New York, NY 10065
- (5) You shall report all email accounts, social media accounts, phone numbers, and messaging applications to your U.S. Pretrial Services Officer. You shall provide passwords and log-in information to email and social media accounts and submit to monitoring as directed by your U.S. Pretrial Services Officer.
- (6) You shall not create or acquire any new email accounts, social media accounts, phone numbers, and messaging applications without the permission of your U.S. Pretrial Services Officer.
- (7) You shall be limited to 2 (two) email accounts, one for personal use and the other for business.
- (8) You shall report all electronic communications devices to your U.S. Pretrial Services Officer and submit to monitoring of those devices as deemed appropriate by your Pretrial Services Officer. If you obtain any new personal electronic device(s), you shall also submit to monitoring of those devices as deemed appropriate by your U.S. Pretrial Services Officer.

The United States Attorney may at any time revoke or modify any condition of this provisional release or change the period of such supervision. The United States Attorney may discharge you from supervision at any time. The United States Attorney may at any time proceed with the prosecution for this offense should the United States Attorney, in his or her sole discretion, deem such action advisable.

If upon completion of your supervision a written report from your supervising U.S. Pretrial Services Officer is received to the effect that you have complied with all the rules, regulations and conditions and special conditions applicable to your deferred prosecution, no further prosecution will be instituted in this District for the above offense.

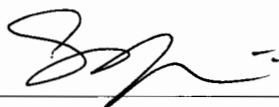
Dated: New York, New York
July 21, 2022

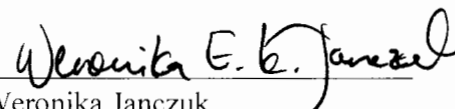
DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 
Edward C. Robinson Jr.
Assistant United States Attorney
Tel.: 212-637-2273

The undersigned hereby consents to the foregoing and expressly waives any and all rights to a speedy trial pursuant to the Sixth Amendment to the United States Constitution, the Speedy Trial Act, 18 U.S.C. §§ 3161 et seq., and any other pertinent provisions, and consents to the adjournment of all pending proceedings in this case. The undersigned further waives the applicable statute of limitations with respect to any prosecution that is not time-barred on the date that this agreement is signed. It is the intent of this provision to toll the applicable statute of limitations during the pendency of the deferred prosecution.

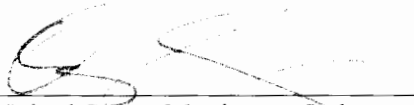
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Sylvie Levine, Esq.
Attorney for Defendant


Weronika Janczuk
Defendant

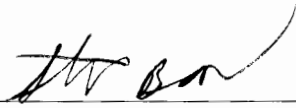
Pursuant to 18 U.S.C. § 3161(h)(2), exclusion under the Speedy Trial Act of the period of time during which the prosecution of the defendant is deferred pursuant to this agreement is hereby approved.

Dated: New York, New York
July 21, 2022


United States Magistrate Judge

The undersigned hereby consents to the foregoing and will accept supervision of the above-named defendant on the conditions set forth herein.

Dated: New York, New York
July 21, 2022


Stephen Boose
United States Pretrial Services Officer